

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for D.T.E. Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the 01-20 Commonwealth of Massachusetts

AT&T's TENTH SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc. hereby submits the following information requests to Verizon. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

The page number references in the following questions are to the hard copy of Dr. Vander Weide's direct testimony that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

ATT-VZ 10-1. Please provide the amount of, and the interest rates paid (quarterly average rates and month end rates) on Verizon's and Verizon-New England's short-term debt obligations as of 6/30/00, 12/31/00, and 3/31/01. Please include all short-term debt obligations of Verizon-New England and its subsidiaries.

ATT-VZ 10-2. Please provide the amount of, and interest rates paid (quarterly average rates and month end rates) on Verizon's and Verizon-New England's commercial paper as of 6/30/00, 12/31/00, and 3/31/01. Please include all commercial paper of Verizon-New England and its subsidiaries.

ATT-VZ 10-3. Please provide a schedule of all TELRIC UNE cost proceedings in which Dr. Vander Weide has testified, including date of testimony, regulatory body to which the testimony was submitted, and case identification number. Please include on this schedule the cost of debt, cost of equity, capital structure weights and overall cost of capital recommended by Dr. Vander Weide in each proceeding. Please also include on this schedule the cost of debt, cost of equity, capital structure weights and overall cost of capital decided by each regulatory body in its final decision.

ATT-VZ 10-4. With respect to the 200 providers that have been authorized for local service in Massachusetts (Vander Weide testimony pg. 27), please provide the following information as of 6/30/00, 12/31/00, and 3/31/01:

- (a) Which of the providers were providing network elements on a facilities basis to paying customers?
- (b) Which of the providers were providing local exchange service lines on a facilities basis to paying customers?
- (c) State the number of lines provided on a facilities basis by each of the providers. If not all elements required for local service were provided, specify which of the network elements were provided by Verizon and which were provided by the alternative provider.
- (d) State the number of lines, by provider, that Verizon had lost to each provider on a facilities basis, on a UNE-P basis, and on a resale basis.

ATT-VZ 10-5. With reference to Dr. Vander Weide's schedule JVW-1 (pg. 3 of 3), in the source note he indicates that "the I/B/E/S growth rate is the April mean estimate of the long-term growth rate as reported by Compustat." However, in the notation he indicates that g is "I/B/E/S mean forecast of future earnings growth March 2001." Which set of forecasts did he actually use in his calculations?

ATT-VZ 10-6. Please state how many local switches Verizon-New England had in service as of 6/30/00, 12/31/00, and 3/31/01.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

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